

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

IN RE POLYURETHANE FOAM ANTITRUST
LITIGATION

MDL Docket No. 2196

Index No. 10-MD-2196 (JZ)

Judge Jack Zouhary

This document relates to:

ALL ACTIONS

**MOTION BY COUNSEL FOR THE SEALY PLAINTIFFS
TO APPOINT KENNY NACHWALTER, P.A. AS LIAISON
COUNSEL FOR DIRECT ACTION (NON-CLASS) PLAINTIFFS**

Counsel for the Sealy Plaintiffs, pursuant to the Federal Rules of Civil Procedure, moves to appoint Kenny Nachwalter, P.A. as liaison counsel for Direct Action (Non-Class) Plaintiffs in MDL 2196. Before filing this Motion, we conferred with counsel for the other direct action (non-class) cases pending in this Court,¹ and are authorized to inform the Court that counsel in all of those cases support this Motion.

The basis for this Motion is set forth in the accompanying Memorandum. If the Court grants this Motion, then we suggest that it issue an Order amending its Amended Order of January 28, 2011 (Dk. 28) identifying the category "Direct Action (Non-Class) Plaintiffs" and designating William J. Blechman of Kenny Nachwalter, P.A. as Liaison Counsel for that category of Plaintiff.

¹ Those cases include: *Factory Direct, Inc. v. The Carpenter Company, et al.*, Case No. 5:11-cv-00045-M (W.D. Ok.), transferred to this Court by MDL Panel, *see* Transfer Order (Dk. 141 May 20, 2011); *Henson Sleep Relief, Inc. v. Hickory Springs Manufacturing Company, et al.*, Case No. 1:11-cv-00095-SA (N.D. Miss.), transferred to this Court by MDL Panel, *see* Conditional Transfer Order (CTO-4) (Dk. 133 May 10, 2011); *H.M. Richards, Inc. et al. v. Hickory Springs Manufacturing Company*, Case No. 1:11-cv-00067-SA (N.D. Miss.), transferred to this Court by MDL Panel, *see* Conditional Transfer Order (CTO-3) (Dk. 73 Apr. 12, 2011); and *Spring Air International LLC, et al v. Hickory Springs Manufacturing Co.*, Case No. 1:11-10001 (N.D. Ohio).

KENNY NACHWALTER, P.A.

Dated: July 8, 2011

Respectfully submitted,

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*LICENSED TO PRACTICE LAW IN MA, UT, DC AND NY; NOT LICENSED IN FLORIDA.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served via ECF on counsel of record, and by e-mail and U.S. Mail on the counsel identified below, this ____ day of July, 2011:

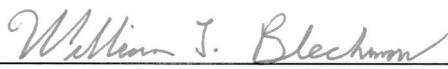
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